

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' MOTION TO SEAL
THEIR REPLY IN SUPPORT OF THEIR MOTION FOR
PRELIMINARY INJUNCTION AND SUPPORTING MATERIALS**

Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) seek to seal portions of their Reply in Support of their Motion for Preliminary Injunction (Doc. 510 “Reply”), portions of the Declaration of J. Alex Halderman (Doc. 510-1 “Halderman Decl.”), the Declaration of Catherine L. Chapple (Doc. 510-4 “Chapple Decl.”), and the entirety of Exhibits A - C (Docs. 510-5, 510-6, 510-7).¹ Exhibits A through C are cyber risk assessments of Georgia’s voting technology conducted by Cloudburst Security and Fortalice

¹ Curling Plaintiffs’ corrected filing (Doc. 510) is intended to replace an outdated version (Doc. 508). Curling Plaintiffs also request that Doc. 508 remain under seal in its entirety or be stricken from the record.

Solutions in support of the Office of the Georgia Secretary of State. These documents have been produced by Defendants in the above-captioned litigation and have been designated by Defendants as Attorney's Eyes Only pursuant to paragraph 3 of the Protective Order (Doc. 477). The Chapple Declaration refers to these documents. Curling Plaintiffs' Reply and the Halderman Declaration have been minimally redacted to only seal information related to these sealed exhibits as well as information related to the GEMS database that has also been designated as Attorney's Eyes Only. For the reasons stated in the brief in support hereof, the Court should grant this Motion.

Dated: July 18, 2019

Respectfully submitted,

/s/ David D. Cross

David D. Cross (*pro hac vice*)

John P. Carlin (*pro hac vice*)

Catherine L. Chapple (*pro hac vice*)

Jane P. Bentrott (*pro hac vice*)

Robert W. Manoso (*pro hac vice*)

MORRISON & FOERSTER LLP

2000 Pennsylvania Avenue, NW

Suite 6000

Washington, DC 20006

Telephone: (202) 887-1500

DCross@mofo.com

JCarlin@mofo.com

CChapple@mofo.com

JBentrott@mofo.com

RManoso@mofo.com

Halsey G. Knapp, Jr.

GA Bar No. 425320
Adam M. Sparks
GA Bar No. 341578
KREVOLIN & HORST, LLC
1201 West Peachtree Street, NW
Suite 3250
Atlanta, GA 30309
HKnapp@khlawfirm.com
Sparks@khlawfirm.com

*Counsel for Plaintiffs Donna Curling,
Donna Price & Jeffrey Schoenberg*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER , ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2019, a copy of the foregoing **Curling Plaintiffs' Motion to Seal their Reply in Support of the their Motion for Preliminary Injunction and Supporting Materials Thereto** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross